

LAW OFFICES OF SCOTT E. LEEMON, P.C.

41 Madison Avenue, 31st Floor

New York, New York 10010

(212) 696-9111--- Office

(917) 238-0880---Mobile

scott@leemonlaw.com

www.leemonlaw.com

February 24, 2024

Via ECF

Honorable Jessica G.L. Clarke

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007-1312

Re: Doe v Combs, et. al. (Pierre)

Docket Number: 1:23-CV-10628 (JGLC)

Dear Judge Clarke:

We submit this letter, as counsel for Harve Pierre, to respectfully join in the arguments raised in the Motion for Judgment on the Pleadings (DE 45), Declaration of Jonathan Davis (with Supporting Documents) (DE 46) and Supplemental Memorandum of Law (DE 47) filed by counsel for Defendant, Sean Combs (and the related corporate defendants).

For the reasons set forth in those documents, the claims revival provision of N.Y.C. Admin. Code § 10-1105 is invalid. Plaintiff's claim against Mr. Pierre must be dismissed as untimely.

Thank you.

Respectfully submitted,

Scott E. Leemon

Scott Leemon

Jonathan Savella

Jonathan Savella

Counsel for Defendant, Harve Pierre

cc: All counsel (via ECF)